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Riverside Health Clinic, LLC & Peyman Heidary

Exhibit #	Document
1	People of the State of California v. Peyman Heidary et al (Case no. RIF1670175)
2	CA Secretary of State: Statement of Information, 03/14/2016

1 MICHAEL A. HESTRIN
2 District Attorney
3 County of Riverside
4 3960 Orange Street, First Floor
5 Riverside, California 92501
6 Telephone: (951) 955-5400
7 John Aki
8 Chief Assistant District Attorney
9 State Bar No. 189395

BAIL: Peyman Heidary \$12,402,000.00
Cary D. Abramowitz \$12,402,000.00
Ana Solis \$12,402,000.00
Gladys Ross \$12,402,000.00

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

MAY 16 2016

S. Heider

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MAY 20 2016
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SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE
(Riverside)

15 THE PEOPLE OF THE STATE OF CALIFORNIA,

NO. RIF 1670175

17 Plaintiff,

18 v.

20 PEYMAN HEIDARY
21 DOB: 08/30/1970
22 AKA: BRIAN HEIDARY
23 AKA: THE GODFATHER
24 AKA: NUMBER ONE

INDICTMENT

26 CARY DAVID ABRAMOWITZ
27 DOB: 10/20/1956

AGENCY#: DAR2012258005/RDA

29 ANA SOLIS
30 DOB: 04/24/1982

32 GLADYS ROSS
33 DOB: 7/17/1962

36 Defendants.

COUNT 1

The Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code section 182, subdivision (a), subsection (1), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, they did willfully and unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of KNOWINGLY MAKING OR CAUSING TO BE MADE ANY FALSE OR FRAUDULENT CLAIMS FOR PAYMENT OF HEALTH CARE BENEFITS, in violation of Penal Code section 550, subdivision (a), subsection (6), a felony, and that pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, the said defendants thereafter committed the following overt act and acts at and in the County of Riverside:

OVERT ACT NO. 1

CARY DAVID ABRAMOWITZ agreed with and allowed PEYMAN HEIDARY, a non-attorney, to exert actual control over California Injury Lawyers, AKA Orange County Law Group, and AKA South Western Law Group (collectively "the Law Firm"). PEYMAN HEIDARY controlled day-to-day operations including scheduling, hiring and firing.

OVERT ACT NO. 2

The Law Firm directed patients to clinics owned and/or controlled by PEYMAN HEIDARY.

OVERT ACT NO. 3

CARY DAVID ABRAMOWITZ, as directed by PEYMAN HEIDARY, paid Cappers \$100 per patient signed up as a client of the Law Firm.

OVERT ACT NO. 4

Cappers began working for PEYMAN HEIDARY when PEYMAN HEIDARY offered Cappers a job in a new law firm opened by PEYMAN HEIDARY and Kenneth Forbes.

OVERT ACT NO. 5

Cappers had worker's compensation claimants sign blank forms, Cappers returned these forms to the Law Firm, who filled them out and submitted them, along with other paperwork, to the Worker's Compensation Appeals Board and various insurance companies.

OVERT ACT NO. 6

The Law Firm filed numerous workers' compensation claims alleging similar or identical injuries.

OVERT ACT NO. 7

Cappers sought out additional claimants from previously identified claimants.

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OVERT ACT NO. 8

PEYMAN HEIDARY owned and/or controlled Riverside Health Clinic, Corona Health Clinic, Montebello Health Clinic, Bellflower Health Clinic, Santa Ana Health Clinic, and Anaheim Health Clinic.

OVERT ACT NO. 9

PEYMAN HEIDARY created the Clinics as Limited Liability Companies.

OVERT ACT NO. 10

PEYMAN HEIDARY moved unqualified, untrained employees between the Clinics and the Law Firm.

OVERT ACT NO. 11

PEYMAN HEIDARY controlled scheduling of doctors at the Clinics.

OVERT ACT NO. 12

PEYMAN HEIDARY controlled payments of the medical professionals at the Clinics.

OVERT ACT NO. 13

PEYMAN HEIDARY controlled patient care at the Clinics, including dictating treatments and referrals. He ordered his employees to ensure that each patient received the same or similar treatment and test studies regardless of injury.

OVERT ACT NO. 14

TOUBA PAKDEL-NABATI contributed to patient care at the Clinics, including dictating treatments and referrals. She ordered her employees to ensure that each patient received the same or similar treatment and test studies regardless of injury.

OVERT ACT NO. 15

QUYNAM NGUYEN received referrals for unnecessary treatment which led to the creation of med-legal reports he caused to be created which QUYNAM NGUYEN knew would later be submitted for billing.

OVERT ACT NO. 16

JASON YANG received referrals for unnecessary treatment which led to the creation of med-legal reports he caused to be created which JASON YANG knew would later be submitted for billing.

OVERT ACT NO. 17

The Clinics submitted bills and liens for treatments ordered by PEYMAN HEIDARY to insurance companies and the WCAB.

OVERT ACT NO. 18

The Law Firm received payments in part from Compromise and Releases from the WCAB and in part from legal fees billed to insurance companies.

OVERT ACT NO. 19

When PEYMAN HEIDARY hired medical and chiropractic professionals to work at the Clinics, he ordered said professionals to create a checking account with PEYMAN HEIDARY as a signatory so he could maintain control of that account. Once created, said professionals were not allowed to make any changes or withdrawals to the account without PEYMAN HEIDARY'S permission. PEYMAN HEIDARY further ordered that any payments made to said professionals be deposited in that professional's checking account and the professionals were paid out of that account.

OVERT ACT NO. 20

PEYMAN HEIDARY ordered said professionals to assign the all outstanding bills/accounts receivables to him. PEYMAN HEIDARY would then bundle the outstanding bills and sell them to third party collections and/or medical factoring firm.

COUNT 2

For a further and separate cause of action, being a different offense from but connected in its commission with the charge set forth in count 1 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully and knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit, to wit, from ACE, and the claim and amount at issue exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a five years and six-month consecutive period.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding \$200,000, within the meaning of Penal Code section 12022.6, subdivision (a), subsection (2).

COUNT 3

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 and 2 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the

1 defendants did willfully and unlawfully and knowingly make and cause to be made a false and
2 fraudulent claim for payment of a health care benefit, to wit, from AMERICAN
3 INTERNATIONAL GROUP (AIG), and the claim and amount at issue exceeded Nine Hundred
4 Fifty dollars (\$950) and the aggregate amount of claims and amount at issue exceeded Nine
5 Hundred Fifty dollars (\$950) in five years and six-month consecutive period.

6 It is further alleged that in the commission and attempted commission of the above
7 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ, and
8 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
9 property of a value exceeding \$65,000, within the meaning of Penal Code section 12022.6,
10 subdivision (a), subsection (1).

11 COUNT 4

12 For a further and separate cause of action, being a different offense from but connected
13 in its commission with the charges set forth in counts 1 through 3 hereof, the Criminal Grand
14 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
15 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
16 Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
17 through and including July 15, 2014, in the County of Riverside, State of California, the
18 defendants did willfully and unlawfully and knowingly make and cause to be made a false and
19 fraudulent claim for payment of a health care benefit, to wit, from
20 BERKSHIRE/HATHAWAY, and the claim and amount at issue exceeded Nine Hundred Fifty
21 dollars (\$950) and the aggregate amount of claims and amount at issue exceeded Nine Hundred
22 Fifty dollars (\$950) in a five years and six-month consecutive period.

23 It is further alleged that in the commission and attempted commission of the above
24 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
25 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
26 property of a value exceeding \$200,000, within the meaning of Penal Code section 12022.6,
27 subdivision (a), subsection (2).

28 COUNT 5

29 For a further and separate cause of action, being a different offense from but connected
30 in its commission with the charges set forth in counts 1 through 4 hereof, the Criminal Grand
31 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
32 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
33 Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
34 through and including July 15, 2014, in the County of Riverside, State of California, the
35 defendants did willfully and unlawfully and knowingly make and cause to be made a false and
36 fraudulent claim for payment of a health care benefit, to wit, from CNA INSURANCE, and the

1 claim and amount at issue exceeded Nine Hundred Fifty dollars (\$950) and the aggregate
2 amount of claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a five
3 years and six-month consecutive period.

4 It is further alleged that in the commission and attempted commission of the above
5 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
6 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
7 property of a value exceeding \$200,000, within the meaning of Penal Code section 12022.6,
8 subdivision (a), subsection (2).

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COUNT 6

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 5 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
through and including July 15, 2014, in the County of Riverside, State of California, the
defendants did willfully and unlawfully and knowingly make and cause to be made a false and
fraudulent claim for payment of a health care benefit, to wit, from CALIFORNIA
RESTAURANT MUTUAL BENEFITS CORPORATION (CRMBC), and the claim and
amount at issue exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of
claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a five years and six-
month consecutive period.

It is further alleged that in the commission and attempted commission of the above
offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
property of a value exceeding \$200,000, within the meaning of Penal Code section 12022.6,
subdivision (a), subsection (2).

COUNT 7

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 6 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
through and including July 15, 2014, in the County of Riverside, State of California, the
defendants did willfully and unlawfully and knowingly make and cause to be made a false and
fraudulent claim for payment of a health care benefit, to wit, from CRUM & FORESTER, and
the claim and amount at issue exceeded Nine Hundred Fifty dollars (\$950) and the aggregate

1 amount of claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a five
2 years and six-month consecutive period.

3 It is further alleged that in the commission and attempted commission of the above
4 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
5 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
6 property of a value exceeding \$200,000, within the meaning of Penal Code section 12022.6,
7 subdivision (a), subsection (2).

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COUNT 8

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 7 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
through and including July 15, 2014, in the County of Riverside, State of California, the
defendants did willfully and unlawfully and knowingly make and cause to be made a false and
fraudulent claim for payment of a health care benefit, to wit, from EMPLOYERS, and the claim
and amount at issue exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of
claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a five years and six-
month consecutive period.

It is further alleged that in the commission and attempted commission of the above
offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
property of a value exceeding \$200,000, within the meaning of Penal Code section 12022.6,
subdivision (a), subsection (2).

COUNT 9

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 8 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
through and including July 15, 2014, in the County of Riverside, State of California, the
defendants did willfully and unlawfully and knowingly make and cause to be made a false and
fraudulent claim for payment of a health care benefit, to wit, from EVEREST NATIONAL
INSURANCE COMPANY (ENIC), and the claim and amount at issue exceeded Nine Hundred
Fifty dollars (\$950) and the aggregate amount of claims and amount at issue exceeded Nine
Hundred Fifty dollars (\$950) in a five years and six-month consecutive period.

1 It is further alleged that in the commission and attempted commission of the above
2 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
3 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
4 property of a value exceeding sixty five thousand dollars (\$65,000.00), within the meaning of
5 Penal Code section 12022.6, subdivision (a), subsection (1).

6 COUNT 10

7 For a further and separate cause of action, being a different offense from but connected
8 in its commission with the charges set forth in counts 1 through 9 hereof, the Criminal Grand
9 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
10 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
11 Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
12 through and including July 15, 2014, in the County of Riverside, State of California, the
13 defendants did willfully and unlawfully and knowingly make and cause to be made a false and
14 fraudulent claim for payment of a health care benefit, to wit, from FARMER'S, and the claim
15 and amount at issue exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of
16 claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a five years and six-
17 month consecutive period.

18 It is further alleged that in the commission and attempted commission of the above
19 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
20 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
21 property of a value exceeding \$200,000, within the meaning of Penal Code section 12022.6,
22 subdivision (a), subsection (2).

23 COUNT 11

24 For a further and separate cause of action, being a different offense from but connected
25 in its commission with the charges set forth in counts 1 through 10 hereof, the Criminal Grand
26 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
27 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
28 Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
29 through and including July 15, 2014, in the County of Riverside, State of California, the
30 defendants did willfully and unlawfully and knowingly make and cause to be made a false and
31 fraudulent claim for payment of a health care benefit, to wit, from FIREMAN'S, and the claim
32 and amount at issue exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of
33 claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a five years and six-
34 month consecutive period.

35 It is further alleged that in the commission and attempted commission of the above
36 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and

1 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
2 property of a value exceeding \$65,000, within the meaning of Penal Code section 12022.6,
3 subdivision (a), subsection (1).

4
5 COUNT 12

6 For a further and separate cause of action, being a different offense from but connected
7 in its commission with the charges set forth in counts 1 through 11 hereof, the Criminal Grand
8 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
9 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
10 Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
11 through and including July 15, 2014, in the County of Riverside, State of California, the
12 defendants did willfully and unlawfully and knowingly make and cause to be made a false and
13 fraudulent claim for payment of a health care benefit, to wit, from HARTFORD, and the claim
14 and amount at issue exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of
15 claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a five years and six-
16 month consecutive period.

17 It is further alleged that in the commission and attempted commission of the above
18 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
19 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
20 property of a value exceeding \$200,000, within the meaning of Penal Code section 12022.6,
21 subdivision (a), subsection (2).

22
23 COUNT 13

24 For a further and separate cause of action, being a different offense from but connected
25 in its commission with the charges set forth in counts 1 through 12 hereof, the Criminal Grand
26 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
27 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
28 Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
29 through and including July 15, 2014, in the County of Riverside, State of California, the
30 defendants did willfully and unlawfully and knowingly make and cause to be made a false and
31 fraudulent claim for payment of a health care benefit, to wit, from INSURANCE CARRIES OF
32 THE WEST (ICW) and the claim and amount at issue exceeded Nine Hundred Fifty dollars
33 (\$950) and the aggregate amount of claims and amount at issue exceeded Nine Hundred Fifty
34 dollars (\$950) in a five years and six-month consecutive period.

35 It is further alleged that in the commission and attempted commission of the above
36 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
property of a value exceeding \$200,000, within the meaning of Penal Code section 12022.6,

1 subdivision (a), subsection (2).

2 COUNT 14.

3 For a further and separate cause of action, being a different offense from but connected
4 in its commission with the charges set forth in counts 1 through 13 hereof, the Criminal Grand
5 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
6 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
7 Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
8 through and including July 15, 2014, in the County of Riverside, State of California, the
9 defendants did willfully and unlawfully and knowingly make and cause to be made a false and
10 fraudulent claim for payment of a health care benefit, to wit, from LIBERTY MUTUAL, and
11 the claim and amount at issue exceeded Nine Hundred Fifty dollars (\$950) and the aggregate
12 amount of claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a five
13 years and six-month consecutive period.

14 It is further alleged that in the commission and attempted commission of the above
15 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
16 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
17 property of a value exceeding \$1,300,000, within the meaning of Penal Code section 12022.6,
18 subdivision (a), subsection (3).

19 COUNT 15

20 For a further and separate cause of action, being a different offense from but connected
21 in its commission with the charges set forth in counts 1 through 14 hereof, the Criminal Grand
22 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
23 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
24 Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
25 through and including July 15, 2014, in the County of Riverside, State of California, the
26 defendants did willfully and unlawfully and knowingly make and cause to be made a false and
27 fraudulent claim for payment of a health care benefit; to wit, from REPUBLIC INDEMNITY,
28 and the claim and amount at issue exceeded Nine Hundred Fifty dollars (\$950) and the
29 aggregate amount of claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in
30 a five years and six-month consecutive period.

31 It is further alleged that in the commission and attempted commission of the above
32 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
33 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
34 property of a value exceeding sixty five thousand dollars (\$65,000.00), within the meaning of
35 Penal Code section 12022.6, subdivision (a), subsection (1).

36 COUNT 16

1 For a further and separate cause of action, being a different offense from but connected
2 in its commission with the charges set forth in counts 1 through 15 hereof, the Criminal Grand
3 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
4 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
5 Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
6 through and including July 15, 2014, in the County of Riverside, State of California, the
7 defendants did willfully and unlawfully and knowingly make and cause to be made a false and
8 fraudulent claim for payment of a health care benefit, to wit, from STATE COMPENSATION
9 INSURANCE FUND (SCIF), and the claim and amount at issue exceeded Nine Hundred Fifty
10 dollars (\$950) and the aggregate amount of claims and amount at issue exceeded Nine Hundred
11 Fifty dollars (\$950) in a five years and six-month consecutive period.

12 It is further alleged that in the commission and attempted commission of the above
13 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
14 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
15 property of a value exceeding \$1,300,000, within the meaning of Penal Code section 12022.6,
16 subdivision (a), subsection (3).

17 COUNT 17

18 For a further and separate cause of action, being a different offense from but connected in
19 its commission with the charges set forth in counts 1 through 16 hereof, the Criminal Grand Jury of
20 the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY
21 DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal Code
22 section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009 through
23 and including July 15, 2014, in the County of Riverside, State of California, the defendants did
24 willfully and unlawfully and knowingly make and cause to be made a false and fraudulent claim for
25 payment of a health care benefit, to wit, from TRAVELER'S, and the claim and amount at issue
26 exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of claims and amount at
27 issue exceeded Nine Hundred Fifty dollars (\$950) in a five years and six-month consecutive period.

28 It is further alleged that in the commission and attempted commission of the above
29 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
30 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
31 property of a value exceeding \$1,300,000, within the meaning of Penal Code section 12022.6,
32 subdivision (a), subsection (3).

33 COUNT 18

34 For a further and separate cause of action, being a different offense from but connected
35 in its commission with the charges set forth in counts 1 through 17 hereof, the Criminal Grand
36 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and

1 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
2 Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
3 through and including July 15, 2014, in the County of Riverside, State of California, the
4 defendants did willfully and unlawfully and knowingly make and cause to be made a false and
5 fraudulent claim for payment of a health care benefit, to wit, from ZENITH, and the claim and
6 amount at issue exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of
7 claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a five years and six-
8 month consecutive period.

9 It is further alleged that in the commission and attempted commission of the above
10 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
11 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
12 property of a value exceeding \$65,000, within the meaning of Penal Code section 12022.6,
13 subdivision (a), subsection (1).

14 COUNT 19

15 For a further and separate cause of action, being a different offense from but connected
16 in its commission with the charges set forth in counts 1 through 18 hereof, the Criminal Grand
17 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
18 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Penal
19 Code section 550, subdivision (a), subsection (6), a felony, in that on or about January 1, 2009
20 through and including July 15, 2014, in the County of Riverside, State of California, the
21 defendants did willfully and unlawfully and knowingly make and cause to be made a false and
22 fraudulent claim for payment of a health care benefit, to wit, from ZURICH, and the claim and
23 amount at issue exceeded Nine Hundred Fifty dollars (\$950) and the aggregate amount of
24 claims and amount at issue exceeded Nine Hundred Fifty dollars (\$950) in a five years and six-
25 month consecutive period.

26 It is further alleged that in the commission and attempted commission of the above
27 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
28 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
29 property of a value exceeding \$1,300,000, within the meaning of Penal Code section 12022.6,
30 subdivision (a), subsection (3).

31 COUNT 20

32 For a further and separate cause of action, being a different offense from but connected
33 in its commission with the charges set forth in counts 1 through 19 hereof, the Criminal Grand
34 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
35 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of
36 Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about

1 January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
2 California, the defendants did willfully and unlawfully make and cause to be made a knowingly
3 false and fraudulent material statement and material representation, to wit, to ACE, for the
4 purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

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COUNT 21

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 20 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully make and cause to be made a knowingly false and fraudulent material statement and material representation, to wit, to AMERICAN INTERNATIONAL GROUP (AIG) for the purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding \$65,000, within the meaning of Penal Code section 12022.6, subdivision (a), subsection (1).

COUNT 22

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 21 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully make and cause to be made a knowingly false and fraudulent material statement and material representation, to wit, to BERKSHIRE/HATHAWAY for the purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

COUNT 23

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 22 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of

1 Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about
2 January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
3 California, the defendants did willfully and unlawfully make and cause to be made a knowingly
4 false and fraudulent material statement and material representation, to wit, to CNA
5 INSURANCE for the purpose of obtaining and denying compensation, as defined in Labor
6 Code section 3207.

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COUNT 24

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 23 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of
Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about
January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
California, the defendants did willfully and unlawfully make and cause to be made a knowingly
false and fraudulent material statement and material representation, to wit, to CALIFORNIA
RESTAURANT MUTUAL BENEFITS CORPORATION (CRMBC) for the purpose of
obtaining and denying compensation, as defined in Labor Code section 3207.

COUNT 25

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 24 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of
Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about
January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
California, the defendants did willfully and unlawfully make and cause to be made a knowingly
false and fraudulent material statement and material representation, to wit, to CRUM &
FORESTER for the purpose of obtaining and denying compensation, as defined in Labor Code
section 3207.

It is further alleged that in the commission and attempted commission of the above offense the
said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS
and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value
exceeding \$200,000, within the meaning of Penal Code section 12022.6, subdivision (a),
subsection (2).

COUNT 26

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 25 hereof, the Criminal Grand

1 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
2 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of
3 Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about
4 January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
5 California, the defendants did willfully and unlawfully make and cause to be made a knowingly
6 false and fraudulent material statement and material representation, to wit, to EMPLOYERS
7 INSURANCE for the purpose of obtaining and denying compensation, as defined in Labor
8 Code section 3207.

9 It is further alleged that in the commission and attempted commission of the above
10 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
11 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
12 property of a value exceeding sixty five thousand dollars (\$65,000.00), within the meaning of
13 Penal Code section 12022.6, subdivision (a), subsection (1).

14 COUNT 27

15 For a further and separate cause of action, being a different offense from but connected
16 in its commission with the charges set forth in counts 1 through 26 hereof, the Criminal Grand
17 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
18 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of
19 Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about
20 January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
21 California, the defendants did willfully and unlawfully make and cause to be made a knowingly
22 false and fraudulent material statement and material representation, to wit, to EVEREST
23 NATIONAL INSURANCE COMPANY (ENIC), for the purpose of obtaining and denying
24 compensation, as defined in Labor Code section 3207.

25 COUNT 28

26 For a further and separate cause of action, being a different offense from but connected
27 in its commission with the charges set forth in counts 1 through 27 hereof, the Criminal Grand
28 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
29 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of
30 Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about
31 January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
32 California, the defendants did willfully and unlawfully make and cause to be made a knowingly
33 false and fraudulent material statement and material representation, to wit, to FARMER'S
34 INSURANCE for the purpose of obtaining and denying compensation, as defined in Labor
35 Code section 3207.

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COUNT 29

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 28 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully make and cause to be made a knowingly false and fraudulent material statement and material representation, to wit, to FIREMAN'S, for the purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding sixty five thousand dollars (\$65,000.00), within the meaning of Penal Code section 12022.6, subdivision (a), subsection (1).

COUNT 30

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 29 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of California, the defendants did willfully and unlawfully make and cause to be made a knowingly false and fraudulent material statement and material representation, to wit, to HARFORD, for the purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

It is further alleged that in the commission and attempted commission of the above offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed property of a value exceeding sixty five thousand dollars (\$65,000.00), within the meaning of Penal Code section 12022.6, subdivision (a), subsection (1).

COUNT 31

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 30 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about

1 January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
2 California, the defendants did willfully and unlawfully make and cause to be made a knowingly
3 false and fraudulent material statement and material representation, to wit, to INSURANCE
4 CARRIERS OF THE WEST (ICW), for the purpose of obtaining and denying compensation, as
5 defined in Labor Code section 3207.

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COUNT 32

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 31 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of
Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about
January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
California, the defendants did willfully and unlawfully make and cause to be made a knowingly
false and fraudulent material statement and material representation, to wit, to LIBERTY
MUTUAL for the purpose of obtaining and denying compensation, as defined in Labor Code
section 3207.

COUNT 33

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 32 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of
Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about
January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
California, the defendants did willfully and unlawfully make and cause to be made a knowingly
false and fraudulent material statement and material representation, to wit, to REPUBLIC
INDEMNITY for the purpose of obtaining and denying compensation, as defined in Labor
Code section 3207.

COUNT 34

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 33 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of
Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about
January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
California, the defendants did willfully and unlawfully make and cause to be made a knowingly
false and fraudulent material statement and material representation, to wit, to STATE

1 COMPENSATION INSURANCE FUND (SCIF), for the purpose of obtaining and denying
2 compensation, as defined in Labor Code section 3207.

3 It is further alleged that in the commission and attempted commission of the above
4 offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
5 ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
6 property of a value exceeding \$200,000, within the meaning of Penal Code section 12022.6,
7 subdivision (a), subsection (2).

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COUNT 35

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 34 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of
Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about
January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
California, the defendants did willfully and unlawfully make and cause to be made a knowingly
false and fraudulent material statement and material representation, to wit, to TRAVELERS
INSURANCE, for the purpose of obtaining and denying compensation, as defined in Labor
Code section 3207.

It is further alleged that in the commission and attempted commission of the above
offense the said defendants, PEYMAN HEIDARY and CARY DAVID ABRAMOWITZ and
ANA SOLIS and GLADYS ROSS, with the intent so to do, took, damaged and destroyed
property of a value exceeding sixty five thousand dollars (\$65,000.00), within the meaning of
Penal Code section 12022.6, subdivision (a), subsection (1).

COUNT 36

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 35 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of
Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about
January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
California, the defendants did willfully and unlawfully make and cause to be made a knowingly
false and fraudulent material statement and material representation, to wit, to ZENITH
INSURANCE for the purpose of obtaining and denying compensation, as defined in Labor
Code section 3207.

COUNT 37

For a further and separate cause of action, being a different offense from but connected

1 in its commission with the charges set forth in counts 1 through 36 hereof, the Criminal Grand
2 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
3 CARY DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS of a violation of
4 Insurance Code section 1871.4, subdivision (a), subsection (1), a felony, in that on or about
5 January 1, 2009 through and including July 15, 2014, in the County of Riverside, State of
6 California, the defendants did willfully and unlawfully make and cause to be made a knowingly
7 false and fraudulent material statement and material representation, to wit, to ZURICH for the
8 purpose of obtaining and denying compensation, as defined in Labor Code section 3207.

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COUNT 38

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 37 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
February 25, 2011, in the County of Riverside, State of California, the defendant did willfully,
knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
period, involving monetary instruments of a total value exceeding five thousand dollars
(\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
twenty-five thousand dollars (\$25,000.00), to wit, a \$729.333 WIRE from VION
OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA
MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the
promotion, management, establishment, or carrying on of any criminal activity, or knowing that
the monetary instrument is derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above
offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million
Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
subsection (1)(B).

COUNT 39

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 38 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
April 7, 2011, in the County of Riverside, State of California, the defendant did willfully,
knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
period, involving monetary instruments of a total value exceeding five thousand dollars
(\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding

1 twenty-five thousand dollars (\$25,000.00), to wit, a \$263, 651.22 WIRE from VION
2 OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA
3 MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the
4 promotion, management, establishment, or carrying on of any criminal activity; or knowing that
5 the monetary instrument is derived directly or indirectly from criminal activity.

6 It is further alleged that in the commission and attempted commission of the above
7 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
8 exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million
9 Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
10 subsection (1)(B).

11 COUNT 40

12 For a further and separate cause of action, being a different offense from but connected
13 in its commission with the charges set forth in counts 1 through 39 hereof, the Criminal Grand
14 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
15 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
16 May 20, 2011, in the County of Riverside, State of California, the defendant did willfully,
17 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
18 period, involving monetary instruments of a total value exceeding five thousand dollars
19 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
20 twenty-five thousand dollars (\$25,000.00), to wit, a \$173,113.78 WIRE from VION
21 OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA
22 MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the
23 promotion, management, establishment, or carrying on of any criminal activity, or knowing that
24 the monetary instrument is derived directly or indirectly from criminal activity.

25 It is further alleged that in the commission and attempted commission of the above
26 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
27 exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million
28 Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
29 subsection (1)(B).

30 COUNT 41

31 For a further and separate cause of action, being a different offense from but connected
32 in its commission with the charges set forth in counts 1 through 40 hereof, the Criminal Grand
33 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
34 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
35 June 24, 2011, in the County of Riverside, State of California, the defendant did willfully,
36 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day

1 period, involving monetary instruments of a total value exceeding five thousand dollars
2 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
3 twenty-five thousand dollars (\$25,000.00), to wit, a \$143,353.87 WIRE from VION
4 OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA
5 MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the
6 promotion, management, establishment, or carrying on of any criminal activity, or knowing that
7 the monetary instrument is derived directly or indirectly from criminal activity.

8 It is further alleged that in the commission and attempted commission of the above
9 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
10 exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand
11 Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
12 subsection (1)(A).

13 COUNT 42

14 For a further and separate cause of action, being a different offense from but connected
15 in its commission with the charges set forth in counts 1 through 41 hereof, the Criminal Grand
16 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
17 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about July 22,
18 2011, in the County of Riverside, State of California, the defendant did willfully, knowingly
19 and unlawfully conduct a transaction, and more than one transaction in a seven day period,
20 involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00),
21 and more than one transaction involving monetary instruments of a total exceeding twenty-five
22 thousand dollars (\$25,000.00), to wit, a \$93,343.88 WIRE from VION OPERATIONS LLC to
23 BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB
24 Account with the specific intent to promote or facilitate the promotion, management,
25 establishment, or carrying on of any criminal activity, or knowing that the monetary instrument
26 is derived directly or indirectly from criminal activity.

27 It is further alleged that in the commission and attempted commission of the above
28 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
29 exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand
30 Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
31 subsection (1)(A).

32 COUNT 43

33 For a further and separate cause of action, being a different offense from but connected
34 in its commission with the charges set forth in counts 1 through 42 hereof, the Criminal Grand
35 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
36 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about

1 August 25, 2011, in the County of Riverside, State of California, the defendant did willfully,
2 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
3 period, involving monetary instruments of a total value exceeding five thousand dollars
4 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
5 twenty-five thousand dollars (\$25,000.00), to wit, a \$200,870.01 WIRE from VION
6 OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA
7 MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the
8 promotion, management, establishment, or carrying on of any criminal activity, or knowing that
9 the monetary instrument is derived directly or indirectly from criminal activity.

10 It is further alleged that in the commission and attempted commission of the above
11 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
12 exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million
13 Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
14 subsection (1)(B).

15 COUNT 44

16 For a further and separate cause of action, being a different offense from but
17 connected in its commission with the charges set forth in counts 1 through 43 hereof, the
18 Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN
19 HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or
20 about September 23, 2011, in the County of Riverside, State of California, the defendant did
21 willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a
22 seven-day period, involving monetary instruments of a total value exceeding five thousand
23 dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total
24 exceeding twenty-five thousand dollars (\$25,000.00), to wit, a \$204,452.35 WIRE from VION
25 OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA
26 MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the
27 promotion, management, establishment, or carrying on of any criminal activity, or knowing that
28 the monetary instrument is derived directly or indirectly from criminal activity.

29 It is further alleged that in the commission and attempted commission of the above
30 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
31 exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million
32 Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
33 subsection (1)(B).

34 COUNT 45

35 For a further and separate cause of action, being a different offense from but connected
36 in its commission with the charges set forth in counts 1 through 44 hereof, the Criminal Grand

1 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
2 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
3 October 26, 2011, in the County of Riverside, State of California, the defendant did willfully,
4 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
5 period, involving monetary instruments of a total value exceeding five thousand dollars
6 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
7 twenty-five thousand dollars (\$25,000.00), to wit, a \$201,494.74 WIRE from VION
8 OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA
9 MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the
10 promotion, management, establishment, or carrying on of any criminal activity, or knowing that
11 the monetary instrument is derived directly or indirectly from criminal activity.

12 It is further alleged that in the commission and attempted commission of the above
13 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
14 exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million
15 Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
16 subsection (1)(B).

17 COUNT 46

18 For a further and separate cause of action, being a different offense from but connected in its
19 commission with the charges set forth in counts 1 through 45 hereof, the Criminal Grand Jury
20 of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
21 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
22 November 23, 2011, in the County of Riverside, State of California, the defendant did willfully,
23 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
24 period, involving monetary instruments of a total value exceeding five thousand dollars
25 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
26 twenty-five thousand dollars (\$25,000.00), to wit, a \$165,673.92 WIRE from VION
27 OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA
28 MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the
29 promotion, management, establishment, or carrying on of any criminal activity, or knowing that
30 the monetary instrument is derived directly or indirectly from criminal activity.

31 It is further alleged that in the commission and attempted commission of the above
32 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
33 exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million
34 Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
35 subsection (1)(B).

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COUNT 47

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 46 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about December 22, 2011, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00), to wit, a \$325,315.31 WIRE from VION OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c), subsection (1)(B).

COUNT 48

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 47 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about January 24, 2012, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00), to wit, a \$288,369.74 WIRE from VION OPERATIONS LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million

1 Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
2 subsection (1)(B).

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4 COUNT 49

5 For a further and separate cause of action, being a different offense from but connected
6 in its commission with the charges set forth in counts 1 through 48 hereof, the Criminal Grand
7 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
8 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
9 February 24, 2012, in the County of Riverside, State of California, the defendant did willfully,
10 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
11 period, involving monetary instruments of a total value exceeding five thousand dollars
12 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
13 twenty-five thousand dollars (\$25,000.00), to wit, a \$233,071.99 WIRE from CAREPOINT
14 FUNDING I LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA
15 MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the
16 promotion, management, establishment, or carrying on of any criminal activity, or knowing that
17 the monetary instrument is derived directly or indirectly from criminal activity.

18 It is further alleged that in the commission and attempted commission of the above
19 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
20 exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million
21 Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
22 subsection (1)(B).

23
24 COUNT 50

25 For a further and separate cause of action, being a different offense from but connected
26 in its commission with the charges set forth in counts 1 through 49 hereof, the Criminal Grand
27 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
28 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
29 March 26, 2012, in the County of Riverside, State of California, the defendant did willfully,
30 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
31 period, involving monetary instruments of a total value exceeding five thousand dollars
32 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
33 twenty-five thousand dollars (\$25,000.00), to wit, a \$291,621.54 WIRE from CAREPOINT
34 FUNDING I LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA
35 MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the
36 promotion, management, establishment, or carrying on of any criminal activity, or knowing that
the monetary instrument is derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above

1 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
2 exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million
3 Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
4 subsection (1)(B).

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COUNT 51

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 50 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
April 20, 2012, in the County of Riverside, State of California, the defendant did willfully,
knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
period, involving monetary instruments of a total value exceeding five thousand dollars
(\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
twenty-five thousand dollars (\$25,000.00), to wit, a \$369,637.05 WIRE from CAREPOINT
FUNDING I LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA
MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the
promotion, management, establishment, or carrying on of any criminal activity, or knowing that
the monetary instrument is derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above
offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million
Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
subsection (1)(B).

COUNT 52

For a further and separate cause of action, being a different offense from but
connected in its commission with the charges set forth in counts 1 through 51 hereof, the
Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN
HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or
about September 14, 2012, in the County of Riverside, State of California, the defendant did
willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a
seven day period, involving monetary instruments of a total value exceeding five thousand
dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total
exceeding twenty-five thousand dollars (\$25,000.00), to wit, a \$93,273.05 WIRE from JAVLIN
ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL
IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,
management, establishment, or carrying on of any criminal activity, or knowing that the

1 monetary instrument is derived directly or indirectly from criminal activity.

2 It is further alleged that in the commission and attempted commission of the above
3 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
4 exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand
5 Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
6 subsection (1)(A).

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COUNT 53

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 52 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
October 9, 2012, in the County of Riverside, State of California, the defendant did willfully,
knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
period, involving monetary instruments of a total value exceeding five thousand dollars
(\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
twenty-five thousand dollars (\$25,000.00), to wit, a \$97,075.74 WIRE from JAVLIN ONE
LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL
IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,
management, establishment, or carrying on of any criminal activity, or knowing that the
monetary instrument is derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above
offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand
Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
subsection (1)(A).

COUNT 54

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 53 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
November 9, 2012, in the County of Riverside, State of California, the defendant did willfully,
knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
period, involving monetary instruments of a total value exceeding five thousand dollars
(\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
twenty-five thousand dollars (\$25,000.00), to wit, a \$178,684.31 WIRE from JAVLIN ONE
LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL

1 IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,
2 management, establishment, or carrying on of any criminal activity, or knowing that the
3 monetary instrument is derived directly or indirectly from criminal activity.

4 It is further alleged that in the commission and attempted commission of the above
5 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
6 exceeding One Hundred Fifty Thousand Dollars (\$150,000.00) but less than One Million
7 Dollars (\$1,000,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
8 subsection (1)(B).

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COUNT 55

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 54 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
December 14, 2012, in the County of Riverside, State of California, the defendant did willfully,
knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
period, involving monetary instruments of a total value exceeding five thousand dollars
(\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
twenty-five thousand dollars (\$25,000.00), to wit, a \$129,277.35 WIRE from CAREPOINT
ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL
IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,
management, establishment, or carrying on of any criminal activity, or knowing that the
monetary instrument is derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above
offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand
Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
subsection (1)(A).

COUNT 56

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 55 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
December 28, 2012, in the County of Riverside, State of California, the defendant did willfully,
knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
period, involving monetary instruments of a total value exceeding five thousand dollars
(\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding

1 twenty-five thousand dollars (\$25,000.00), to wit, a \$83,770.99 WIRE from CAREPOINT
2 ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL
3 IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,
4 management, establishment, or carrying on of any criminal activity, or knowing that the
5 monetary instrument is derived directly or indirectly from criminal activity.

6 It is further alleged that in the commission and attempted commission of the above
7 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
8 exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand
9 Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
10 subsection (1)(A).

11 COUNT 57

12 For a further and separate cause of action, being a different offense from but connected
13 in its commission with the charges set forth in counts 1 through 56 hereof, the Criminal Grand
14 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
15 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
16 January 10, 2013, in the County of Riverside, State of California, the defendant did willfully,
17 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
18 period, involving monetary instruments of a total value exceeding five thousand dollars
19 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
20 twenty-five thousand dollars (\$25,000.00), to wit, a \$58, 584.06 WIRE from CAREPOINT
21 ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL
22 IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,
23 management, establishment, or carrying on of any criminal activity, or knowing that the
24 monetary instrument is derived directly or indirectly from criminal activity.

25 It is further alleged that in the commission and attempted commission of the above
26 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
27 exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand
28 Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
29 subsection (1)(A).

30 COUNT 58

31 For a further and separate cause of action, being a different offense from but connected
32 in its commission with the charges set forth in counts 1 through 57 hereof, the Criminal Grand
33 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
34 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
35 January 25, 2013, in the County of Riverside, State of California, the defendant did willfully,
36 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day

1 period, involving monetary instruments of a total value exceeding five thousand dollars
2 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
3 twenty-five thousand dollars (\$25,000.00), to wit, a \$45,007.01 WIRE from CAREPOINT
4 ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL
5 IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,
6 management, establishment, or carrying on of any criminal activity, or knowing that the
7 monetary instrument is derived directly or indirectly from criminal activity.

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COUNT 59

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 58 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
February 8, 2013, in the County of Riverside, State of California, the defendant did willfully,
knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
period, involving monetary instruments of a total value exceeding five thousand dollars
(\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
twenty-five thousand dollars (\$25,000.00), to wit, a \$71,401.00 WIRE from CAREPOINT
ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL
IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,
management, establishment, or carrying on of any criminal activity, or knowing that the
monetary instrument is derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above
offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand
Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
subsection (1)(A).

COUNT 60

For a further and separate cause of action, being a different offense from but connected
in its commission with the charges set forth in counts 1 through 59 hereof, the Criminal Grand
Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
February 22, 2013, in the County of Riverside, State of California, the defendant did willfully,
knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
period, involving monetary instruments of a total value exceeding five thousand dollars
(\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
twenty-five thousand dollars (\$25,000.00), to wit, a \$140,543.25 WIRE from CAREPOINT

1 ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL
2 IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,
3 management, establishment, or carrying on of any criminal activity, or knowing that the
4 monetary instrument is derived directly or indirectly from criminal activity.

5 It is further alleged that in the commission and attempted commission of the above
6 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
7 exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand
8 Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
9 subsection (1)(A).

10 COUNT 61

11 For a further and separate cause of action, being a different offense from but connected
12 in its commission with the charges set forth in counts 1 through 60 hereof, the Criminal Grand
13 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
14 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
15 March 11, 2013, in the County of Riverside, State of California, the defendant did willfully,
16 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
17 period, involving monetary instruments of a total value exceeding five thousand dollars
18 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
19 twenty-five thousand dollars (\$25,000.00), to wit, a \$32,005.61 WIRE from CAREPOINT
20 ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL
21 IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,
22 management, establishment, or carrying on of any criminal activity, or knowing that the
23 monetary instrument is derived directly or indirectly from criminal activity.

24 COUNT 62

25 For a further and separate cause of action, being a different offense from but connected
26 in its commission with the charges set forth in counts 1 through 61 hereof, the Criminal Grand
27 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
28 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
29 April 8, 2013, in the County of Riverside, State of California, the defendant did willfully,
30 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
31 period, involving monetary instruments of a total value exceeding five thousand dollars
32 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
33 twenty-five thousand dollars (\$25,000.00), to wit, a \$21,521.79 WIRE from CAREPOINT
34 ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL
35 IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,
36 management, establishment, or carrying on of any criminal activity, or knowing that the

1 monetary instrument is derived directly or indirectly from criminal activity.

2 COUNT 63

3 For a further and separate cause of action, being a different offense from but connected
4 in its commission with the charges set forth in counts 1 through 62 hereof, the Criminal Grand
5 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
6 violation of Penal Code section 186.10, subdivision (a); a felony, in that on or about
7 April 23, 2013, in the County of Riverside, State of California, the defendant did willfully,
8 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
9 period, involving monetary instruments of a total value exceeding five thousand dollars
10 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
11 twenty-five thousand dollars (\$25,000.00), to wit, a \$50,547.85 WIRE from CAREPOINT
12 ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL
13 IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,
14 management, establishment, or carrying on of any criminal activity, or knowing that the
15 monetary instrument is derived directly or indirectly from criminal activity.

16 It is further alleged that in the commission and attempted commission of the above
17 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
18 exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand
19 Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
20 subsection (1)(A).

21 COUNT 64

22 For a further and separate cause of action, being a different offense from but connected
23 in its commission with the charges set forth in counts 1 through 63 hereof, the Criminal Grand
24 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
25 violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
26 May 24, 2013, in the County of Riverside, State of California, the defendant did willfully,
27 knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day
28 period, involving monetary instruments of a total value exceeding five thousand dollars
29 (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding
30 twenty-five thousand dollars (\$25,000.00), to wit, a \$82,357.60 WIRE from CAREPOINT
31 ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL
32 IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion,
33 management, establishment, or carrying on of any criminal activity, or knowing that the
34 monetary instrument is derived directly or indirectly from criminal activity.

35 It is further alleged that in the commission and attempted commission of the above
36 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions

1 exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand
2 Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
3 subsection (1)(A).

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COUNT 65

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 64 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about June 7, 2013, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00), to wit, a \$71,322.28 WIRE from CAREPOINT ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity.

It is further alleged that in the commission and attempted commission of the above offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c), subsection (1)(A).

COUNT 66

For a further and separate cause of action, being a different offense from but connected in its commission with the charges set forth in counts 1 through 65 hereof, the Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about June 21, 2013, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction, and more than one transaction in a seven day period, involving monetary instruments of a total value exceeding five thousand dollars (\$5,000.00), and more than one transaction involving monetary instruments of a total exceeding twenty-five thousand dollars (\$25,000.00), to wit, a \$69,115.75 WIRE from CAREPOINT ONE LLC to BEST OF CA PROMOTIONS MGMT INC, CALIFORNIA MEDLEGAL IMAGING'S FMB Account with the specific intent to promote or facilitate the promotion, management, establishment, or carrying on of any criminal activity, or knowing that the monetary instrument is derived directly or indirectly from criminal activity.

1 It is further alleged that in the commission and attempted commission of the above
2 offense the said defendant, PEYMAN HEIDARY, conducted a transaction and transactions
3 exceeding Fifty Thousand Dollars (\$50,000.00) but less than One Hundred Fifty Thousand
4 Dollars (\$150,000.00) within the meaning of Penal Code section 186.10, subdivision (c),
5 subsection (1)(A).

6 COUNT 67

7 For a further and separate cause of action, being a different offense from but connected
8 in its commission with the charges set forth in counts 1 through 66 hereof, the Criminal Grand
9 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY of a
10 violation of Business and Professions Code section 2052, subdivision (a), a felony, in that on or
11 about and between January 1, 2009 through and including July 15, 2014, in the County of
12 Riverside, State of California, the defendant did willfully and unlawfully practice and attempt
13 to practice, and advertise and hold themselves out as practicing, a system and mode of treating
14 the sick and afflicted in this state, and diagnosed, treated, operated for, and prescribed for an
15 ailment, blemish, deformity, disease, disfigurement, disorder, injury, and other physical and
16 mental condition of a person, without having at the time of so doing a valid, unrevoked, and
17 unsuspended certificate as provided by the Business & Professions Code and without being
18 authorized to perform the act pursuant to a certificate obtained in accordance with a provision
19 of law.

20 COUNT 68

21 For a further and separate cause of action, being a different offense from but connected
22 in its commission with the charges set forth in counts 1 through 67 hereof, the Criminal Grand
23 Jury of the County of Riverside by this Indictment hereby accuses PEYMAN HEIDARY and
24 CARY DAVID ABRAMOWITZ and ANA SOLIS of a violation of section 549 of the Penal
25 Code, a felony, in that on or about January 1, 2009 through and including July 15, 2014, in the
26 County of Riverside, State of California, the defendants, did willfully and unlawfully solicited,
27 accepted, or referred any business to or from any individual entity with the knowledge that, or
28 reckless disregard for whether, the individual or entity for or from whom the solicitation or
29 referral is made, or the individual or entity who is solicited or referred, intended to violate
30 section 550 of the Penal Code or section 1871.4 of the Insurance Code.

31 COUNT 69

32 For a further and separate cause of action, being a different offense from but connected
33 in its commission with the charges set forth in counts 1 through 68 hereof, the Criminal
34 Grand Jury of the County of Riverside by this Indictment hereby accuses PEYMAN
35 HEIDARY and CARY DAVID ABRAMOWITZ of a violation of Business and Professions
36 Code section 6126, subdivision (a), a misdemeanor, in that on or about and between July 15,

1 2013 through and including July 15, 2014, in the County of Riverside, State of California,
2 the defendants did willfully and unlawfully advertised or held himself or herself out as
3 practicing or entitled to practice law or otherwise practiced law who is not an active member
4 of the State Bar, or otherwise authorized pursuant to statute or court rule to practice law in
5 this state at the time of doing so.

6 It is further alleged that the said defendants, PEYMAN HEIDARY and CARY
7 DAVID ABRAMOWITZ and ANA SOLIS and GLADYS ROSS, committed two or more
8 related felonies, a material element of which was fraud or embezzlement, which involved a
9 pattern of related felony conduct, and this pattern of related felony conduct involved the
10 taking of more than five hundred thousand dollars (\$500,000.00) within the meaning of
11 Penal Code section 186.11, subdivision (a), subsection (2).

12 **Special Allegation: Zamora**

13 It is further alleged that the above offense was not discovered by the victim(s) until
14 March 26, 2012, when the State Compensation Insurance Fund Investigator Phillis Shorts
15 began her inquiry into suspicious circumstances of fraudulent activity.

16 Investigator Phillis Shorts discovered the fraudulent activity during an investigative
17 review into three individual worker's compensation claimant files who all used the same
18 attorney service and who were all treated by providers associated with clinics owned and
19 operated by Peyman Heidary.

20 On or about August 28, 2012, SCIF Investigator Phillis Shorts referred her findings to
21 an inter-agency team including the Office of the Riverside County District Attorney. Further
22 investigation by the Riverside County District Attorney uncovered a highly sophisticated
23 criminal organization. Over an approximately two year period, the investigation discovered
24 the use of cappers, law offices, and health clinics operated by support staff, chiropractors,
25 and medical doctors all working as directed by Peyman Heidary to bill for similar services
26 and treatment regardless of injury.

27 The scheme was not discovered prior to SCIF Investigator Phillis Shorts' findings due
28 to multiple layers of ownership and control, voluminous legal files, medical records, billing
29 involving hundreds of patient victims, and multiple regulatory violations overseen by
30 multiple enforcement agencies.

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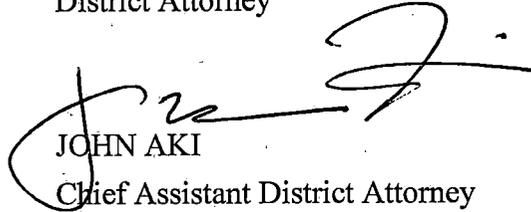
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The Office of the Riverside County District Attorney filed a criminal complaint in case number RIF1409778 against Peyman Heidary, Cary Abramowitz, Michael Tuosto, and Erica Torres on July 25, 2014. (*People v. Zamora* (1976) 18 Cal.3d 538.)

May 16, 2016

MICHAEL A. HESTRIN
District Attorney



JOHN AKI
Chief Assistant District Attorney

JA:tc

1 Names of witnesses examined by the Criminal Grand Jury on finding of the foregoing
2 Indictment:

3 Kathan Lambert

4 Erica Torres

5 Dennis Knotts

6 Jennifer Delgado

7 Angelica Celis

8 Sandra Rubalcaba

9 Crystal Banuelos

10 Todd Loveless

11 Gissel Santibanez

12 Yamileth Petway

13 Ana Solis

14 Yazmine Martinez

15 Erica Lopez

16 Lany Roldan

17 Alejandra Palmerin

18 Corrine Guevara

19 Angelica Juarez

20 Perla Arroyo

21 Craig Johnson

22 Scott Adam

23 Clayton Johnson

24 Touba Pakdel-Nabati

25 Peter Park

26 Agatha Beltran

27 Eugene Sung

28 Kelly Ayers

29 Gladys Ross

30 Isidro Ramirez

31 Denise Rivera

32 Birender Singh

33 Jasmin Ballesteros

34 Oliver Glover

35 Janine Farrell

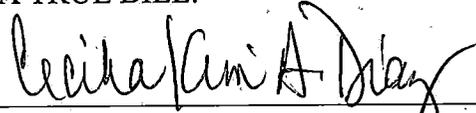
36 Daniel Gancourz

- 1 Kristian Nielson
- 2 Ronda Loyd
- 3 Danny Tran
- 4 Jill Landeros
- 5 Roger Gutierrez
- 6 Maria Kramer
- 7 Gina Gribble
- 8 Anthony Hurtado
- 9 Gordon Oard
- 10 Aaron Lewis
- 11 Phillis Shorts
- 12 Fidel Borrego
- 13 Anne Luce
- 14 Glen Smith
- 15 Don Terrell
- 16 John Auenin
- 17 Nicole Sullivan
- 18 Chris Dill
- 19 Cynthia Becher
- 20 Yanti Soliman
- 21 Denise Magdaleno
- 22 Kurt Lackman
- 23 Sean Nealy
- 24 John Standish
- 25 David Wall
- 26 James Fisher
- 27 Kerry O'Brien
- 28 Lawrence Westcott
- 29 Quynam Nguyen
- 30 Jason Yang
- 31 Tushar Doshi
- 32 Diane Zimmerman
- 33 Jennifer Finch
- 34 James Munoz
- 35 Tamara Cooper
- 36 June Trujillo

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Mercedes Hernandez
Jasmine Valadez

A TRUE BILL:



Foreperson of the Criminal Grand Jury

1 MICHAEL A. HESTRIN
2 District Attorney
3 County of Riverside
4 3960 Orange Street, First Floor
5 Riverside, California 92501
6 Telephone: (951) 955-5400
7 John Aki
8 Chief Assistant District Attorney
9 State Bar No. 189395

11 SUPERIOR COURT OF CALIFORNIA
12 COUNTY OF RIVERSIDE
13 (Riverside)

15 THE PEOPLE OF THE STATE OF CALIFORNIA,
16 Plaintiff,

17 v.

18 PEYMAN HEIDARY
19 DOB: 08/30/1970
20 AKA: BRIAN HEIDARY
21 AKA: THE GODFATHER
22 AKA: NUMBER ONE
23
24 CARY DAVID ABRAMOWITZ
25 DOB: 10/20/1956
26
27 ANA SOLIS
28 DOB: 04/24/1982
29
30 GLADYS ROSS
31 DOB: 07/17/1962

32 Defendants.

Case No.

REQUEST/MOTION FOR
PROSECUTION DISCOVERY
(Pen. Code, §§ 1054.3,
1054.5(a) & (b))

34 TO: THE HONORABLE JUDGE OF THE SUPERIOR COURTS AND TO COUNSEL
35 FOR ABOVE-NAMED DEFENDANTS:

36 PLEASE BE INFORMED that the Office of the District Attorney of Riverside County,

1 acting on behalf of the Plaintiff, the People of the State of California, hereby requests/moves for
2 discovery/disclosure of the following items from the defendants and counsels in this case,
3 pursuant to Penal Code section 1054.3(a) and (b):

4 1. The names and addresses of persons, other than the defendants, counsels or defendants
5 intend to call as witnesses at trial;

6 2. Any relevant written or recorded statements of the persons in No. 1 above and/or
7 reports of the statement of such persons;

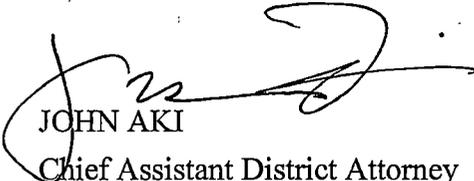
8 3. Any reports or statement of experts made in connection with this case, including, but
9 not limited to, the results of physical or mental examinations, scientific tests, experiments, or
10 comparisons which the defendant or counsel intend to offer as evidence at the trial of this case;
11 and

12 4. Any "real," i.e., tangible or physical, evidence which the defendant or counsel intends
13 to offer in evidence at the trial.

14 PLEASE TAKE NOTE that pursuant to the provisions of Penal Code section 1054.5(b) if
15 the above material and information requested is not provided to counsel for the plaintiff within
16 15 days of this request, a court order will be sought to promptly enforce the provisions of Penal
17 Code section 1054.3.

18
19 Dated: May 16, 2016

20
21 Respectfully submitted,
22 MICHAEL A. HESTRIN
23 District Attorney

24
25
26 
27 JOHN AKI
28 Chief Assistant District Attorney

29
30 JA:tc



State of California
Secretary of State

L

STATEMENT OF INFORMATION
(Limited Liability Company)

106

FILED
Secretary of State
State of California

MAR 14 2016

Filing Fee \$20.00. If this is an amendment, see instructions.

IMPORTANT — READ INSTRUCTIONS BEFORE COMPLETING THIS FORM

1. LIMITED LIABILITY COMPANY NAME
RIVERSIDE HEALTH CLINIC, LLC:

This Space For Filing Use Only

File Number and State or Place of Organization

2. SECRETARY OF STATE FILE NUMBER
201229210180

3. STATE OR PLACE OF ORGANIZATION (If formed outside of California)
CALIFORNIA

No Change Statement

4. If there have been any changes to the information contained in the last Statement of Information filed with the California Secretary of State, or no Statement of Information has been previously filed, this form must be completed in its entirety.

If there has been no change in any of the information contained in the last Statement of Information filed with the California Secretary of State, check the box and proceed to Item 15.

Complete Addresses for the Following (Do not abbreviate the name of the city. Items 5 and 7 cannot be P.O. Boxes.)

5. STREET ADDRESS OF PRINCIPAL OFFICE	CITY	STATE	ZIP CODE
1540 COACHWOOD STREET	LA HABRA	CALIFORNIA	90631

6. MAILING ADDRESS OF LLC, IF DIFFERENT THAN ITEM 5	CITY	STATE	ZIP CODE
P.O. BOX 5265	FULLERTON	CALIFORNIA	92838

7. STREET ADDRESS OF CALIFORNIA OFFICE	CITY	STATE	ZIP CODE
1540 COACHWOOD STREET	LA HABRA	CA	90631

Name and Complete Address of the Chief Executive Officer, If Any

8. NAME	ADDRESS	CITY	STATE	ZIP CODE

Name and Complete Address of Any Manager or Managers, or if None Have Been Appointed or Elected, Provide the Name and Address of Each Member (Attach additional pages, if necessary.)

9. NAME	ADDRESS	CITY	STATE	ZIP CODE
PEYMAN HEIDARY	P.O. BOX 5265	FULLERTON	CA.	92838

10. NAME	ADDRESS	CITY	STATE	ZIP CODE

11. NAME	ADDRESS	CITY	STATE	ZIP CODE

Agent for Service of Process If the agent is an individual, the agent must reside in California and Item 13 must be completed with a California address, a P.O. Box is not acceptable. If the agent is a corporation, the agent must have on file with the California Secretary of State a certificate pursuant to California Corporations Code section 1505 and Item 13 must be left blank.

12. NAME OF AGENT FOR SERVICE OF PROCESS
MICHAEL J. KHOURI, ESQ.

13. STREET ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, IF AN INDIVIDUAL	CITY	STATE	ZIP CODE
4040 BARRANCA PARKWAY, SUITE 280	IRVINE	CA	92604

Type of Business

14. DESCRIBE THE TYPE OF BUSINESS OF THE LIMITED LIABILITY COMPANY
INVESTMENT ENTITY

15. THE INFORMATION CONTAINED HEREIN, INCLUDING ANY ATTACHMENTS, IS TRUE AND CORRECT.

MARCH 9, 2016
DATE

PEYMAN HEIDARY
TYPE OR PRINT NAME OF PERSON COMPLETING THE FORM

MANAGER
TITLE

Peyman Heidary
SIGNATURE